

# Federal Defenders OF NEW YORK, INC.

Southern District  
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September 3, 2020

**BY ECF**

The Honorable Judge Laura T. Swain  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**RE: United States v. William Jimenez**  
**20 Cr. 122 (LTS)**

Honorable Judge Swain:

I write with the consent of the Government to request adjournment of the defense's pretrial motions deadline and the September 18 pretrial conference. I ask that the pretrial motions deadline be extended to October 2, with the pretrial conference adjourned to October 9 or the week of October 12. The adjournment will give the defense additional time to prepare motions in consultation with Mr. Jimenez who is at MCC NY. The adjournment will also provide the parties with additional time to discuss a pretrial resolution. As noted, the Government consents to the adjournment.

Mr. Jimenez consents to the exclusion of time under the Speedy Trial Act until the date of the next status conference.

THE APPLICATION IS GRANTED. THE MOTION DEADLINE IS EXTENDED TO OCTOBER 2, 2020, AND THE CONFERENCE IS ADJOURNED TO OCTOBER 9, 2020, AT A MORNING TIME TO BE DETERMINED. THE COURT FINDS PURSUANT TO 18 U.S.C. § 3161(h)(7)(A) THAT THE ENDS OF JUSTICE SERVED BY AN EXCLUSION OF THE TIME FROM TODAY'S DATE THROUGH OCTOBER 9, 2020, OUTWEIGH THE BEST INTERESTS OF THE PUBLIC AND THE DEFENDANTS IN A SPEEDY TRIAL FOR THE REASONS STATED ABOVE. THE COURT WILL REQUEST A VIDEO-CONFERENCE SETTING FOR THE MORNING OF OCTOBER 9, 2020. THE TIME AND MODALITY CANNOT BE CONFIRMED UNTIL THE LATTER PART OF THE WEEK BEFORE THE CONFERENCE. ACCORDINGLY, COUNSEL ARE REQUESTED TO HOLD OPEN 9:00 A.M. TO 2:00 P.M. ON OCTOBER 9, 2020, UNTIL FURTHER NOTICE. DEFENSE COUNSEL IS FURTHER DIRECTED TO CONFIRM THAT DEFENDANT WAIVES PERSONAL ATTENDANCE AND INFORM THE COURT BY SEPTEMBER 23, 2020, AS TO WHETHER COUNSEL WISHES TO HAVE A PRIVATE 15 MINUTE CONSULTATION WITH THE CLIENT IMMEDIATELY BEFORE THE CONFERENCE AND, IF SO, TO PROVIDE THE TELEPHONE NUMBER AT WHICH COUNSEL CAN BE REACHED FOR THAT CONSULTATION. DE# 24 RESOLVED.  
SO ORDERED.

/s/ Laura Taylor Swain, USDJ 9/4/2020

Respectfully submitted,  
*/s/ Zawadi Baharanyi*

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Zawadi Baharanyi  
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